

**REMARKS**

The above-referenced patent application has been reviewed in light of the Office Action referenced above. Claims 1-16 are currently pending. Assignee respectfully acknowledges the Examiner's indication that claim 3 contains allowable subject matter and that claims 1, and 6-8 have been allowed. Claim 2, 4, and 5 stand rejected under 35 USC §102 as being unpatentable over US Patent No. 5,929,899 of Takahashi et al. (hereinafter Takahashi). Claims 1-8 are currently amended and new claims 9-14 have been added. The amendments to claims 1, 3, and 6-8 do not narrow the scope of those claims, and in some instances broaden their scope. Therefore, it is asserted that no prosecution history estoppel should result from these amendments. The amendments to claim 2, 4, and 5 are made to clarify claimed subject matter and do not narrow the scope of those claims. In addition, the amendments to claims 2, 4, and 5 in some instances broaden the scope of those claims. Therefore, it is asserted that no prosecution history estoppel should result from these amendments. No new matter has been presented. Reconsideration of the above-referenced patent application in view of the foregoing amendments and following remarks is respectfully requested.

To establish a *prima facie* case of unpatentability under 35 U.S.C. § 102, the examiner must establish that each and every aspect of the rejected claim is taught by the cited document. With respect to the merits of the specific claim rejections, we begin by discussing claim 2, as amended. Regarding this claim, Takehashi does not teach each and every element of claim 2, as amended. Therefore, it is respectfully asserted that the Examiner has failed to make out a *prima facie* case of unpatentability. Specifically, Takehashi does not teach "arranging a plurality of primary or secondary color data constituting a pixel in a fixed sequence in said memory unit." In light of this, it is respectfully requested that the rejection of claim 2 on this basis be withdrawn.

Claims 4 and 5 distinguish from the cited document on at least the same and/or a similar basis as amended claim 2. It is therefore respectfully requested that the rejection of claims 4 and 5 be withdrawn as well. In addition, new claims 9-16 are believed to distinguish from the cited document on

a similar basis as allowed claims 1 and 6-8 and/or claim 2, 4, and 5, as amended. It is therefore respectfully requested that new claims 9-16 be allowed to proceed to issuance.

#### **COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE**

The Examiner's statements of reasons for allowance of claim 1, and 6-8 are hereby acknowledged by Assignee. Assignee agrees that claimed subject matter is patentably distinct from the documents cited by the Examiner; however, Assignee takes no position regarding the reasons for allowance presented by the Examiner, other than the positions Assignee may have previously taken during prosecution of the above-referenced patent application. Therefore, the Examiner's reasons for allowance should not be attributed to Assignee as an indication of the basis for Assignees' belief that the claims are patentably distinct. Furthermore, it is respectfully asserted that there may also be additional reasons for patentability of claimed subject matter not explicitly stated in this record. While in accordance with 37 C.F.R. §1.104(e), a failure by the Assignee to disagree with the Examiner, or file more detailed comments, does not give rise to any implication that the Assignee agrees with or acquiesce in the reasoning of the Examiner, here, by this document, Assignee is expressly making clear that no such agreement or acquiesce is present.

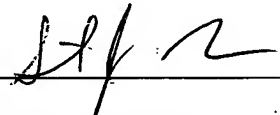
**CONCLUSION**

In view of the foregoing, it is respectfully submitted that all of the claims pending in this patent application, as amended, are in condition for allowance. If the Examiner has any questions, he is invited to contact the undersigned at (503) 439-6500. Consideration of this patent application and early allowance of all the claims is respectfully requested.

Please charge any shortages and credit any overcharges of any fees required for this submission to Deposit Account number 50-3703.

Respectfully submitted,

Dated: 1/19/06

  
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